



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Blue Ridge Regional Office

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February 3, 2014

Mr.J.B. Broughman
City Manager
City of Covington
333 West Locust Street
Covington, Virginia 24426

Re: Reissuance of VPDES Permit No. VA0025542, Covington WWTP
Public Notice Comments

Dear Mr. Broughman:

In response to the letter, on behalf of the City of Covington, from Lawrence Hoffman of CHA Companies, dated January 17, 2014, minor changes have been made to the draft permit. Responses to comments in the letter are provided below, in the same order as in the referenced letter.

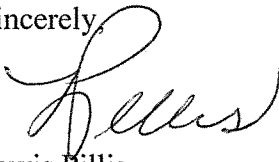
1. No change has been made to the total phosphorus annual limit of 0.5 mg/L and a schedule of compliance has not been included in the permit. This is appropriate, since the City has agreed to this limit by signing the *Virginia Water Quality Improvement Fund Point Source Grant And Operation And Maintenance Agreement* on November 11, 2013. DEQ signed this Agreement on January 7, 2014. We believe that treatment installed in 2013, to meet the limit, has not been operational long enough to establish an average efficiency. It is anticipated that there will be improved efficiency after the Inflow and Infiltration Reduction Plan is completed.
2. The due date for I&I Plan quarterly reports, in part I.B.14, page 9, has been changed from the 1st to the 10th of the month as requested.
3. The understanding is correct, that trading via the Virginia Nutrient Credit Exchange Program is acceptable to meet the growing season Total Nitrogen (TN) limit if these credits were generated during the same growing season from an upstream discharger with TN allocation in the Jackson River TMDL, and are documented by submitting the credit exchange notification form to the Regional Office according to the permit's special condition I.B.1.d.iii.

4. WET limit report due dates have been corrected, and subsections of Part I.C, page 10, correctly renumbered as noted in the letter.

5. The Pretreatment annual report due date in Part I. D.6 has been changed from the 15th to the 31st, as requested.

In addition, we intend to adjust the permit's expiration date, so that it will be at the end of a month. Tentatively, it will be January 31, 2019. This will only shorten the permit term by nine days. You should be receiving the reissued permit soon. Feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Pillis", written in a cursive style.

Lewis Pillis
Water Permit Writer